

Congress of the United States
Washington, DC 20515

June 7, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Pruitt:

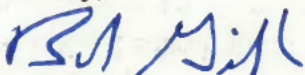
It has come to our attention that an age requirement in the Environmental Protection Agency's Certification and Training of Pesticide Applicators rule, published on January 4, 2017, could impose unintended burdens on state regulators and pesticides applicators. It is our understanding that affected industries and stakeholders support the majority of the rule, which establishes competency standards for applicators of Restricted Use Pesticides (RUPs). We can all agree reasonable aptitude and safety standards are necessary to keep individuals safe when handling pesticides. However, we urge you to consider revisiting and revising this age requirement.

The rule sets a minimum age requirement for commercial RUP applicators at 18 years. Prior to this rulemaking, individuals under the age of 18 were able to apply RUPs if they met EPA's certification and training requirements. The federal government delegated authority to the states to certify and enforce pesticide application requirements under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and many states currently allow individuals under 18 to apply pesticides. Establishing a federal age limit for certification will increase labor costs for many pesticide application businesses nationwide. While some states could come into compliance with the rule by taking an administrative action, at least ten state legislatures and potentially several more, will need to pass new laws.

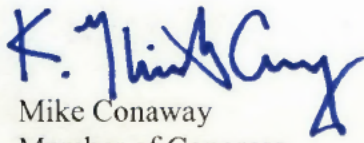
Forcing states to change their laws to meet an age requirement is unnecessary to ensure pesticides are applied correctly and safely. If individuals are able to pass the competency and certification standards set by your agency and carried out by state certifying entities, and equip themselves with the proper personal protective equipment that EPA may designate for safety to the worker as the agency does per its authority under FIFRA, the federal government should not require states to change their laws to meet an age requirement. We understand this rule was finalized by the previous Administration, but hope the EPA will review this portion of the rule under your leadership.

Again, we agree standards and certifications for applicators are crucial. We respectfully request you consider the impact this age requirement could have on states and revisit its inclusion in this rule. Thank you for your consideration.

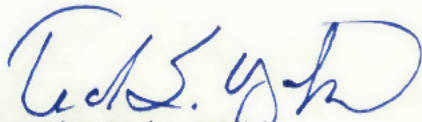
Sincerely,



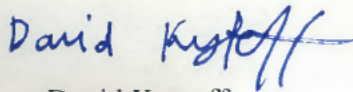
Bob Gibbs
Member of Congress




Mike Conaway
Member of Congress



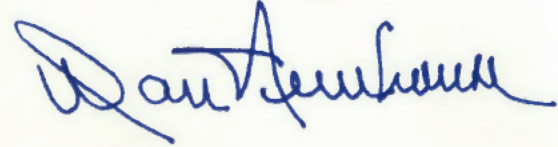
Ted S. Yoho, DVM
Member of Congress



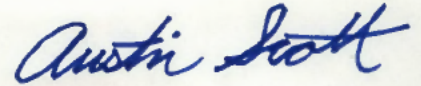
David Kustoff
Member of Congress



Glenn 'GT' Thompson
Member of Congress



Dan Newhouse
Member of Congress



Austin Scott
Member of Congress